UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 7
11201 Renner Boulevard
Lenexa, Kansas 66219

MAR 13 2014

MEMORANDUM
(Via electronic mail only)

SUBJECT: Response to memo titled "Cherokee County Railroads OU8 Human Health Risk Assessment (HHRA) – Initial Data Review" dated February 28, 2014

FROM: Elizabeth Hagenmaier, RPM
Special Emphasis Remedial Branch

THRU: Dave Drake, Section Chief
Special Emphasis Remedial Section

Todd Phillips, EPA Risk Assessor
Environmental Services Division

TO: Amber Bacon, David Hohreiter, and Mark Follansbee
SRC, Inc.

This memorandum addresses the comments submitted via electronic mail on February 28, 2014. If you have any questions, please contact me at (913) 551-7939.

RESPONSE TO COMMENTS

Is it EPA's intention to include the historical data (pre- 2013) in the HHRA dataset? Or are these historical data intended only to fill potential data gaps not covered by the 2013 sampling effort? If the historical data are to be included in the HHRA, SRC would need additional documentation such as sample location maps and some missing information on sampling date and depth.

Due to the inadequacies and incompleteness of the pre-2013 data, it should not be considered for either the potential data gap identification or incorporation into the HHRA dataset.

Is the 4 foot sampling depth outlined in the SAP for the 2013 sampling effort intended to represent the depth of the ballast?

The 4-foot sampling depth was agreed upon as the extent of ballast previously seen during the remedial actions at the Cherokee County Superfund site.

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The SAP indicates that each soil sample was to be uniquely identified as CCR-SS-1234 or CCR-SO-1234-XX where "SS" stands for surface soil sample and "SO" stands for subsurface soil sample. In the *Final Excel Report ASR6105* table where similar nomenclature is included (Location_Desc field), it appears that a slightly different naming convention was implemented as CCR-SS-XX (X-X) or CCR-SO-XX (X-X).

Please regard the "SS" and "SO" samples identically. The two identifications were not adequately implemented in the field.

SRC assumes that the numbers in parentheses represent the sampling depth in inches (e.g., 0-6, 6-12, 12-18, etc).

The assumption of the sampling depth is correct.

There are five samples noted as CCR-SO-XX (0-6). If the above assumption is correct, then these samples represent surface soil samples and not subsurface samples as indicated by the "SO" in the name. Conversely, samples labeled as CCR-SS-XX (X-X) appear to include both samples collected at the surface (0-6 inches) and below the surface (>6 inches). Should SRC assume that the numbers in the parentheses accurately represent the depth at which the sample was collected and ignore the SO and SS nomenclature?

Yes, please ignore the "SO" and "SS" nomenclature.

The sample names appear to include the location number followed by a letter (e.g., CCR-SS-1A, CCR-SS-3B, CCR-SS-13D, etc.). The SAP does not include description of this letter code. Can EPA please describe what these letters represent?

These letters indicate the number of sample locations taken at a single site location. For example, Location 13 had five (5) sampling locations (13A, 13B, 13C, 13D, 13E) taken along the abandoned rail line to demonstrate consistency along a rail line. Additionally, the second letter in that string indicated the direction off the rail line the sample was taken to account for the extent of contamination on either side of the rail line.

Cadmium was reported as not detected in three samples (Detection_ID = "U"). Can EPA confirm if the values reported for these three samples represent the method detection limits?

Yes, the values reported represent the method detection limits.